

**IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF PENNSYLVANIA**

RENEE ZINSKY,

Plaintiff,

vs.

Civil Action

No. 2:22-cv-547

Judge Horan

MICHAEL RUSSIN, RUSSIN FINANCIAL,
RUSSIN GROUP, SIMON ARIAS, III,
ARIAS AGENCIES, S.A. ARIAS HOLDINGS, LLC,
AMERICAN INCOME LIFE INSURANCE
COMPANY,

Defendants.

JURY TRIAL DEMANDED

**PLAINTIFF’S MOTION FOR LEAVE TO FILE REPLY TO DEFENDANT RUSSIN’S
RESPONSE TO MOTION FOR EXTENSION OF DISCOVERY**

AND NOW, comes the Plaintiff, Renee Zinsky, by and through undersigned counsel files the within Motion for Leave to file Reply to Defendant Michael Russin’s (“Defendant Russin”) Response to Plaintiff’s Amended Motion for Extension of Discovery in this case and avers as follows:

1. On or February 21, 2023, Plaintiff filed a Motion for Extension of Time to Complete Discovery. [Doc. No. 53.]
2. On or about February 26, 2023, Plaintiff filed an Amended Motion for Extension of Time to Complete Discovery. [Doc. No. 55.]
3. On or about February 28, 2023, Defendant Russin filed a Motion for Extension of Time to Respond/Reply to Plaintiff’s Amended Motion for Extension of Time to Complete Discovery [Doc. No. 56.]
4. On or about February 28, 2023, this Honorable Court granted the aforementioned Defendant Russin’s Motion for Extension of Time to Respond. [Doc. No. 57.]
5. On or about March 6, 2023, Defendant Russin filed a Response to Plaintiff’s Amended

Motion for Extension of Time to Complete Discovery and Brief in Support thereof. [Docs. Nos. 58, 59].

6. Given the new and novel allegations raised by Defendant Russin's Response to Plaintiff's Amended Motion for Extension of Time to Complete Discovery and Brief in Support thereof, Plaintiff filed a Reply to Defendant Russin's Response to Amended Motion for Extension of Time to Complete Discovery and Brief in Support thereof to same on or about March 7, 2023 Reply. [Doc. No. 60].

7. Pursuant to this Honorable Court's Standing Order dated April 13, 2022, Plaintiff respectfully requests leave of Court to consider Plaintiff's filed Reply to Defendant Russin's Response to Amended Motion for Extension of Time to Complete Discovery and Brief in Support thereof.

WHEREFORE, Plaintiff's counsel respectfully requests this Court grant Plaintiff's Motion for Leave to File Reply Defendant Russin's Response to Amended Motion for Extension of Time to Complete Discovery and Brief in Support thereof.

Respectfully submitted,

/s/ Amy N. Williamson

Amy N. Williamson, Esq.

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CERTIFICATE OF SERVICE

I hereby certify on this 7th day of March, 2023 I electronically served a copy of the foregoing **REPLY TO DEFENDANT RUSSIN'S RESPONSE TO PLAINTIFF'S MOTIONS TO EXTEND DISCOVERY** via the CM/ECF system which will send notification of such filing.

/s/ Amy N. Williamson

Amy N. Williamson, Esq.